

**Before the
Federal Communications Commission
Washington, DC 20554**

In the matter of:

**Amendment of Part 97 of the Commission's
Amateur Service Rules Governing
Operating Privileges**

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RM-10413

Comments of Michael Dinelli, N9BOR

I oppose RM-10413, which includes the expansion of HF phone allocations to the detriment of cw/digital modes. The ARRL survey was flawed and does not represent a consensus of the amateur radio community. The ARRL board of directors did not agree with their own survey; their petition differs from the survey results. The ARRL never published the survey results in their entirety.

The so-called Novice subbands are currently available and utilized by all amateur license classes for cw and state of the art digital modes.

Reallocating 7125 kHz to 7150 kHz for voice will waste spectrum. Powerful international broadcast stations use this allocation, which render wideband voice modes impotent. Narrow cw/digital modes remain the current best use for these frequencies.

National Traffic System (NTS) and other training nets regularly meet on the allocations subject to reassignment (particularly 80-meters). These nets require ample spectrum to pass traffic off of the primary net frequency. Relegating these emergency training nets to the already crowded general class cw/digital allocations would hinder their ability to function.

Part 97.1 (b) and 91(c) define the basis and purpose of the Amateur Radio Service. Expanding antiquated phone allocations will not serve these goals. Reject RM-10413 and the amateur service will have ample room to invent, learn and use state of the art digital modes, as well as the simple and effective cw mode.

Thank you for considering my comments.